

I am writing to express STRONG support for the new VIDEO relay service made available to deaf, hard of hearing and deaf-blind individuals across the country.

VIDEO IS QUALITATIVELY BETTER THAN TEXT RELAY. There is a significant POSITIVE qualitative difference in communication provided via sign language and sign supported voice carry over connections. This new service is finally giving deaf, hard of hearing and deaf-blind individuals a VOICE and enhanced access, unequal to any other access attempts to date. Research indicates that the MEANING of a message is not carried in the words, per se, but in elements of tonality, affective overlays, etc. In the video mode, both deaf and hearing consumers are able to access "tone of voice" and the nuances of tonality, as well as background noise/information (e.g. baby crying, alarm sounding). This supports truly equal access to the communication interaction, supporting natural turn-taking, information sharing, and genuine interpersonal connections.

SUGGESTED CHANGES. I urge the FCC to make several changes – some related to rules of service and protocol, others related to improved/increased services. First, I am URGING FCC to increase funding to video relay services, making it possible to have Spanish/ASL interpreters available, to have the service available 24/7, and to make the service viable economically to the service providers, with an eye to the cost of highly skilled interpreters required to do this task and the appropriate ratio of supervisors/interpreters on the floor during a shift.

1. SPANISH/ASL Fifty percent of the people living in the US speak Spanish, a high percentage of whom speak no English. The deaf/ASL using member of that family is doubly isolated from communication. This service is needed to allow a deaf person to

communicate with her/his family members; a deaf child's teacher to contact Spanish-speaking parents to discuss educational issues or concerns; an English-speaking employer or co-worker needs to contact a Spanish-speaking employee about a shift change. This service is currently being provided for Federal employees, but not for the rest of the country – a

2. MANDATORY SERVICE ‡ 24/7 COVERAGE While the number of interpreters required for overnight service might be small, video relay should be available to consumers every day of the week, any time of the day or night. Emergency calls need to be placed to hospitals/doctors, employees with unforeseen illness or other emergencies need to report to employers, an urgent call to the poison center. As the service is currently offered, individuals at the height of panic are being forced to text relay service, in which they are required to use 2nd language (English), attempt to convey emotional information via an emotionless format, and struggle through other barriers that inhibit equal and accessible communication.

3. PAY RATES FCC must reimburse service providers at rates that make the service economically viable, i.e. at the \$14.64 rate recommended by NECA in 2003. This rate is required for several reasons: (a) the expense of the technology and on-going research and development to support the provision of real-time interactive video services with undistorted visual images; (b) the pay rate required for video interpreters and floor

supervisors whose skills are exponentially greater than those required of text relay agents; (c) the numbers of VIs/ratio of floor agents required to provide service due to the physical demands of managing interpreted messages between spoken and visual languages. Research has indicated that in the best of settings – 3-dimension, where interpreters can get prep material and are able to ascertain contextual information, etc. – the accuracy of an interpretation begins to deteriorate after 20-minutes and the danger of physical damage due to overuse syndrome is exacerbated over time. These factors influence the length of time an individual is able to stay “in call” while ensuring the integrity of the interpretation and safety of the interpreters. While video relay is opening the door to truly equal access to telephone service for deaf, deaf-blind and hard of hearing individuals, the challenges for the VIs are considerable. In addition to the challenges of the technology (2-dimension, poor quality video), callers with limited language skills (recent immigrants) and/or additional disabilities (cerebral palsy, partial paralysis), and a challenging range of call content (legal, medical, educational), video interpreters are challenged by regional variations in sign language and linguistic varieties among various age and ethnic signers. This results in hiring highly qualified, certified interpreters, providing on-going professional development and adequate working conditions to support the work.

Finally, I am concerned that protocol and rules of operation put in place for text relay are being laid down “wholesale” on the new service of video relay, to the detriment of consumers. The FCC needs to “individualize” the rules of service provided via VIDEO relay, as opposed to TEXT relay.

1. TEN-MINUTE MINIMUM. It is my understanding that the FCC requires VIs to stay in a call received for the first 10-minutes, before being allowed to switch out with another interpreter. This rule may make sense where there is no visual connection between caller and relay agent/operator, because identities of each party are fairly well obscured. In a video call, however, both the caller and VI can see each other which means dynamics can arise that inhibit and/or skew effective communication. The caller and VI may recognize each other from previous interactions (video or in the real world), the interpreter may not be able to process the signs being produced (regional variations, signer has additional disabling conditions obscuring communication, etc.) This rule, should be changed to allow a VI to step out of a call in less than 10-min. in the presence of extenuating circumstances.

2. ABUSIVE/SEXUALLY CHARGED CALLERS. Again, the fact that caller and VI can see each other makes it possible for a caller to masturbate just off screen while signing with the VI, other individuals in the camera view to take off their clothes or engage in sexual behaviors – apparently to get a rise from the VI or for the thrill of having a witness. Policies should be put in place that protect VIs and allow such calls to be disconnected.